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Comments on the Second Draft: Delta-Interim Plan
Submitted to the Delta Stewardship Council via email to interimplan@deltacouncil.ca.gov
Submitted by Nicole S. Suard, Esq., Managing Member, Snug Harbor Resorts, LLC

Comments are submitted in order as found on the Interim Plan:

(1) Page 3, line 30 to 33 regarding levee classification system used by the Delta Vision Strategic Plan, Table 4-1. Please note that the Delta Vision data regarding Delta levees references use of the data from DRMS Phase 1 Final Report, which is currently being corrected due to inaccurate Delta levee historical data used. It is suggested a line be added that only verified accurate Delta levee data be utilized prior to any final determination of actions.

(2) Page 5, lines 3 and 4, please add "corrected" before the reference to DRMS

(3) Page 13, Map displaying various data regarding targeted islands of the Delta. Note that Ryer Island should show as the "red" color because the island has a residential population of 300 to 400 persons, not including the seasonal residents that are on the island more than 60 days per year generally. The current map color indicates 100 or less residents, which is incorrect.

(4) Page 14 refers to sources of information including items 2 and 3. Please add the word "corrected" before the word DRMS.

(5) The map which shows some of the export targets for Delta water could be improved to define which sub-whole sellers purchase from MWD or another Wholeseller; there should also be a clear map or chart showing the breakdown of Delta water export use between residential or urban, agriculture, industrial and thermoelectrical power generation. DWR and others developed good tables 2000 to 2005 which can be submitted for reference upon request.

General comment: Since the proposed projects of the Interim Plan, coupled with the projects already completed or close to operation, appear to be the building of the CalFed "Preferred Alternative" central canal, (see map next page) why not recognize the body of studies and reports that were developed to reach the 2000 CalFed ROD?

General comment: Once the Interim Plan construction projects are completed, including the dredging of the McCormack/Williamson area, channel dredging and setbacks of the Mokelumne River adjacent to Staten Island, dredging and channel setbacks of the lower Mokelumne, initiate use of the Freeport pump, DCC reoperation, CCWD new intake at Victoria Canal, and the two gates project, will there even be a need for an additional canal around the Delta?

Respectfully submitted,

Nicole S. Suard, Esq. (via email)

Note: Please go to <http://www.deltaREvision.com> for full size copy of the attached map

Building Blocks for 2012 canal

<http://www.dbw.ca.gov/PDF/DeltaAssessment-PDF/Chapter7/Chapter7.pdf>

Map from CalFed 2000 "Preferred Alternative"

This map provides the reference to the various "building blocks" for the Central Canal, a near term action. Many of the actions are already approved through EIR/EIS processes. The goal of the Central Canal, according to various documents, is to **increase diversion** of the fresh water of the Sacramento to the pumps to allow for reliable water export to other locations in the State, and to create fish barriers to stop the fish from being entrapped and killed by the pumps.

